

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

KARL REINKE,

Debtor,

No. 09-19609

APPLICATION TO HIRE RICHARD JONES
AS SPECIAL COUNSEL FOR DEBTOR

COMES NOW the debtor, Karl Reinke, and applies to the court as follows:

1. That the debtor filed these proceedings under the above cause number.

2. The debtor would like to retain Richard Jones as Special Counsel to represent the debtor in a pending matter that was filed in King County Superior Court, in an action to determine the amount, nature, and validity of the debtor's underlying mortgages on his real properties. The matter is being removed to this Court under the provisions of *11 USC Section 1452*. The nexus of the complaint asserts, *intra alia*, claims for wrongful foreclosure of a Deed of Trust securing Debtor's real property, in violation of *RCW 61.24, et seq.*, breach of contract, defamation to title to Debtor's real property, malicious prosecution, violation of *RCW 19.86, et seq.*, RESPA and Fair Debt Collection Practices Act, *15 USC 1962*. A copy of Debtor's Complaint is attached to the Declaration of Richard Jones of October 28, 2009 as Exhibit "A".

3. Mr. Jones will be paid on a general retainer, upon notice and hearing. His hourly rate is \$ 275.00/hr. Said fees will not duplicate the services to be rendered by Mr. Feinstein, the debtor's general bankruptcy counsel.

3. Fees for Mr. Jones will be paid only after notice and hearing and application under Section 330 and Section 331 of the Bankruptcy Code.

4. This application is supported by the Declaration of Mr. Jones.

1 Wherefore, the debtor prays for an order authorizing employment of special
2 counsel accordingly.

3 DATED this 9th day of November, 2009.

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5 /s/ Larry B. Feinstein

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7 Larry B. Feinstein WSBA # 6074
8 Attorney for debtor
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